

June 26, 2015

Julie Saare-Edmonds
Urban Water Efficiency Unit

SUBJECT: Proposed Changes to California's Model Water Efficient Landscape Ordinance (MWELO)

Dear Julie:

I am opposed to the following proposed changes to the current Model Water Efficient Landscape Ordinance (MWELO).

Your proposal to increase the irrigation efficiencies for residential areas to 0.85 and non-residential areas to .92 are unattainable. There is no combination of irrigation products in today's irrigation market to achieve these proposed efficiencies. We cannot even attain this sort of efficiency from natural rainfall. In my experience, I have seen drip with efficiency values of .85 to .90 at best.

Recommendation: Do not change the current value of Irrigation Efficiency and leave as .71.

Your proposal to reduce the ETAF to .5 for residential areas and .4 for non-residential areas are unattainable due to the unrealistic irrigation efficiencies used in the formula (.85 and .92).

Recommendation: Do not change the current irrigation efficiency (leave as .71) but reduce the plant factors to the .425 for residential areas and .37 for commercial areas (as proposed in the MWELO). This will encourage the use of low water use / California friendly plants in landscapes.

Your proposal to maximize precipitation rate to 1.0 inches per hour will eliminate many high efficiency spray solutions as well as eliminate large rotors from being used. **Recommendation:** Do not set a limit in the precipitation rate on flat areas and leave the precipitation rate limit of .75 for slopes only. Studies (U of Arizona) have shown that lower precipitation rates can lead to wind drift and evaporative losses resulting in lower efficiency.

The proposed MWELO does not address or provide sufficient information in regards to calculations with emphasis on the SLA consideration. Add information regarding water budget allotments and require water agencies move to a water budget base system as some water purveyors (IRWD / EMWD) have been doing and is proven to work. This will not stifle innovation and design ingenuity.

I believe the proposed changes to the MWELO are unwise and were not well-thought-out. I believe they are changes that were "taken out of a hat by a magician" to come up to a quick response on how to save water during this time of drought, similar to the Executive Order B-29-15. As we have seen our current 2009 MWELO has greatly shaped the irrigation industry. It has allowed the irrigation manufacturers to develop new and efficient products and the professional designers / architects to design efficient landscapes. In reality, the true water wasters are not from these efficient landscapes (in new developments), they are existing landscapes that contain hundreds of square feet of grass that are being irrigated with inefficient systems that are never maintained or looked at. Let's fine tune the current 2009 MWELO with realistic changes that reflect our current market and not start from scratch.

Respectfully,

Luis Sierra
Clark and Green Associates